

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
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U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRENA BENTLEY,

Defendant.

INDICTMENT

1:19 CR 389

CASE NO.

Title 18, United States Code,
Sections 1001(a), 1341, and 1344(2)

JUDGE BOYKO

GENERAL ALLEGATIONS

At all times material and relevant to this Indictment:

1. Defendant TRENA BENTLEY resided in Fairview Park, Ohio, in the Northern District of Ohio, Eastern Division.
2. On or about June 6, 2011, Defendant began employment with the U.S. Postal Service ("USPS"). On or about August 5, 2011, Defendant began working as a clerk for the USPS in the Northern District of Ohio, Eastern Division. On or about April 19, 2014, Defendant was promoted to career status, and worked as a General Expeditor.
3. On or about July 8, 2014, Defendant mailed Stein Insurance Agency check number 24828, in the amount of \$15,105.40, made payable to McGown Program Administrators, to R.H. to a P.O. Box controlled by the USPS Office of Inspector General ("USPS OIG") in Houston, Texas. Defendant and R.H. agreed that R.H. would either cash the check or open an account to deposit the check, and then send half of the money to Defendant.
4. The McGowan Program Administrators is company located in Fairview Park, Ohio, in the Northern District of Ohio, Eastern Division.

5. M.G. is a real person known to the Grand Jury, who resided in Wooster, Ohio, in the Northern District of Ohio, Eastern Division.

6. W.R. is a real person known to the Grand Jury, who resided in Wellington, Ohio, in the Northern District of Ohio, Eastern Division.

7. Farmer's State Bank was a financial institution as defined in Title 18, United States Code, Section 20, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC").

8. JP Morgan Chase was a financial institution as defined in Title 18, United States Code, Section 20, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC").

9. Defendant was the account holder on JP Morgan Chase bank account ending in x2092.

OBJECT OF THE SCHEME

10. The object of the scheme was for Defendant TRENA BENTLEY to deposit stolen checks into an account controlled by Defendant or to mail checks to others involved in the scheme who would deposit or cash the checks, and then split the proceeds.

MANNER AND MEANS

11. It was part of the scheme and artifice that Defendant TRENA BENTLEY would obtain stolen checks, and mail the checks to R.H., and others known and unknown to the Grand Jury. R.H. and others known and unknown to the Grand Jury would then deposit or cash the stolen checks and split the proceeds with Defendant.

12. It was further part of the scheme and artifice that Defendant would deposit stolen checks into a JP Morgan Chase bank account number ending in x2092, which was in Defendant's name and under Defendant's control.

COUNT 1

(Mail Fraud, 18 U.S.C. § 1341)

The Grand Jury charges:

13. Paragraphs 1 through 12 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

14. On or about July 8, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant TRENA BENTLEY, and others known and unknown to the Grand Jury, devised and intended to devise a scheme and artifice to defraud Stein Insurance Agency and to obtain money by false and fraudulent pretenses, representations, and promises.

15. On or about July 8, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant, for the purpose of executing and attempting to execute the scheme and artifice to defraud described above, placed, or caused to be placed, in any depository for mail matter, any matter or thing to be sent or delivered by the Postal Service, and took or received from the Postal Service, any such matter or thing delivered by the Postal Service the following mailing:

Count	Date	Description	Mailed by	Check Payee
1	07/08/2014	Check number 24828, in the amount of \$15,105.40.	Trena Bentley	McGowan Program Administrators

All in violation of Title 18, United States Code, Section 1341.

COUNT 2

(Bank Fraud, 18 U.S.C. § 1344(2))

The Grand Jury further charges:

16. Paragraphs 1 through 12 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

17. At all times material to this Indictment, Farmer's State Bank and JP Morgan Chase were financial institutions as defined in Title 18, United States Code, Section 20, the deposits of which were insured by the FDIC.

18. On or about August 8, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant TRENA BENTLEY, did knowingly execute a scheme and artifice to defraud the financial institutions listed below and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of said federally insured financial institutions, by means of false and fraudulent pretenses, representations, and promises.

Count	Date of Deposit	Transaction	Drawee Bank	Deposit Bank	Check Amount
2	08/08/2014	Check number 12872, made payable to W.R.	Farmer's State Bank	JP Morgan Chase	\$5,073.80

19. Defendant fraudulently endorsed and caused to be fraudulently endorsed check number 12872, drawn on Farmer's State Bank made payable to W.R., which Defendant then deposited into a JP Morgan Chase bank account maintained in her name and over which she maintained signatory authority.

20. In depositing the check set forth in Count 2, Defendant falsely represented that she was entitled to obtain JP Morgan Chase funds in the custody and control of Farmer's State Bank, and that the checks were otherwise valid.

All in violation of Title 18, United States Code, Section 1344(2).

COUNT 3

(False Statement, 18 U.S.C. § 1001(a))

The Grand Jury further charges:

21. On or about February 4, 2015, in the Northern District of Ohio, Eastern Division, Defendant TRENA BENTLEY unlawfully, willfully and knowingly, in a matter within the jurisdiction of the executive branch of the United States, specifically, the USPS, falsified,

concealed, and covered up by trick, scheme, and device material facts, and further made materially false, fictitious, and fraudulent statements and representations, to wit: Defendant drafted and signed a sworn, written statement explaining that she met with L.W. around July to get the check charged in Count 1, check number 24828, in the amount of \$15,105.40, for R.H, when she in fact did not meet with L.W., all in violation of Title 18, United States Code, Section 1001(a).

A TRUE BILL.

Original Document – Signatures on file with Clerk of Courts, pursuant to the E-Government Act of 2002.